

Exhibit A

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,

Debtor.

Case No. 23-13237-pmm

Chapter 11

**Declaration of Michael A. Cibik in Support of Debtor's Application to
Employ Cibik Law, P.C. as Debtor's Counsel**

1. The above debtor wishes to employ Cibik Law, P.C. as its counsel in this case.
2. I am the principal of Cibik Law and make this verified statement on the firm's behalf.
3. Pursuant to L.B.R. 2014-1, Cibik Law makes the following disclosures with respect to payments received from the debtor within the 90 days preceding the order for relief:

Date Payment Received	Amount Received	Amount Applied to Services Rendered Before Receipt	Amount Applied to Services Rendered After Receipt	Amount Remaining on Petition Date
October 20, 2023	\$40,000.00	\$9,380.00	\$11,793.00	\$18,827.00
Total	\$40,000.00	\$9,380.00	\$11,793.00	\$18,827.00

4. Time records for pre-petition services rendered are attached to this declaration.
5. Before filing this case, the debtor paid Cibik Law a retainer of \$40,000.00 in preparation for filing the Chapter 11 bankruptcy. The Firm used \$21,173.00 of that sum for pre-petition services as follows: (i) advising the debtor concerning its obligations under Chapter 11, (ii) preparing the bankruptcy petition and some related documents, including this retention application, and (iii) payment of the Court's \$1,738.00 filing fee. The balance remaining in the Debtor's retainer account is \$18,827.00, which is being held by the firm in its escrow/trust account.
6. Cibik Law has no connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.
7. Cibik Law is not a creditor of the debtor.

8. Cibik Law has represented many bankrupt debtors and is able to perform services required by the debtor related to this case.

9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: October 27, 2023

/s/ Michael A. Cibik
Michael A. Cibik (#23110)
Cibik Law, P.C.
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

CIBIK LAW, P.C.

1500 WALNUT STREET SUITE 900
PHILADELPHIA, PA 19102
(215) 735-1060

Invoice #10003

Posted Date: 10/20/2023

BILL TO:

Tri-State Paper, Inc.

4500 N 3rd St
Philadelphia, PA 19140-1502

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
1	10/09/2023	A107: Communicate (other outside counsel): Phone call with Richard Hoy to discuss potential bankruptcy for debtor. (10/09/2023)	Michael A. Cibik	1	\$750.00	\$750.00
2	10/10/2023	A106: Communicate (with client): Phone call with debtor's principal to discuss potential bankruptcy case and gather information. (10/10/2023)	Michael A. Cibik	1.3	\$350.00	\$455.00
3	10/11/2023	A107: Communicate (other outside counsel): Phone call with John Raimondi to discuss civil litigation concerning stock of company. (10/11/2023)	Michael A. Cibik	0.8	\$750.00	\$600.00
4	10/12/2023	A106: Communicate (with client): Phone call with debtor's CEO to discuss operational issues (10/12/2023)	Michael A. Cibik	1.1	\$750.00	\$825.00
5	10/12/2023	A106: Communicate (with client): Phone call with debtor's principal to discuss chapter 7 vs chapter 11 (10/12/2023)	Michael A. Cibik	1.3	\$750.00	\$975.00
6	10/15/2023	A106: Communicate (with client): Phone call with debtor's CEO to answer questions. (10/15/2023)	Michael A. Cibik	0.9	\$750.00	\$675.00
7	10/16/2023	A106: Communicate (with client): Meeting with Debtor's principal and various corporate officers to discuss financial circumstances. (w/ M. Cibik) (10/16/2023)	Michael I. Assad	1	\$350.00	\$350.00

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
8	10/16/2023	A106: Communicate (with client): Meeting with Debtor's principal and various corporate officers to discuss financial circumstances. (w/ M. Assad) (10/16/2023)	Michael A. Cibik	2	\$750.00	\$1,500.00
9	10/16/2023	A106: Communicate (with client): Phone call with debtor's principal to answer questions and provide advice. (10/16/2023)	Michael A. Cibik	0.1	\$750.00	\$75.00
10	10/16/2023	A104: Review/Analyze: Reviewed mortgage foreclosure complaint filed against debtor by Citizens Bank (10/16/2023)	Michael A. Cibik	0.5	\$750.00	\$375.00
11	10/17/2023	A106: Communicate (with client): Phone call with debtor's principal to answer questions and provide advice. (10/17/2023)	Michael A. Cibik	0.1	\$750.00	\$75.00
12	10/17/2023	A106: Communicate (with client): Phone call with debtor's principal to answer questions and provide advice. (10/17/2023)	Michael A. Cibik	0.6	\$750.00	\$450.00
13	10/17/2023	A106: Communicate (with client): Phone call with debtor's CEO to answer questions. (10/17/2023)	Michael A. Cibik	0.4	\$750.00	\$300.00
14	10/19/2023	A105: Communicate (in firm): Phone call with M. Cibik to discuss case strategy and requirements. (10/19/2023)	Michael I. Assad	0.4	\$350.00	\$140.00
15	10/19/2023	A105: Communicate (in firm): Phone call with M. Assad to discuss case strategy and requirements. (10/19/2023)	Michael A. Cibik	0.4	\$750.00	\$300.00
16	10/19/2023	B160: Fee/Employment Applications: Prepared retainer agreement. (10/19/2023)	Michael I. Assad	0.3	\$350.00	\$105.00
17	10/19/2023	A106: Communicate (with client): Phone call with debtor's CEO to answer questions. (10/19/2023)	Michael A. Cibik	0.2	\$750.00	\$150.00
18	10/20/2023	B110: Case Administration: Drafted corporate resolution authorizing bankruptcy filing. (10/20/2023)	Michael I. Assad	0.3	\$350.00	\$105.00
19	10/20/2023	A106: Communicate (with client): Meeting with debtor's principal to answer questions, discuss process, and collect payment. (w/ M. Assad) (10/20/2023)	Michael A. Cibik	1	\$750.00	\$750.00

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
20	10/20/2023	A106: Communicate (with client): Meeting with debtor's principal to answer questions, discuss process, and collect payment. (w/ M. Cibik) (10/20/2023)	Michael I. Assad	1	\$350.00	\$350.00
21	10/20/2023	A106: Communicate (with client): Phone call with debtor's principal to answer questions and provide advice. (10/20/2023)	Michael A. Cibik	0.1	\$750.00	\$75.00

Notes:

Services performed prior to payment of retainer.

INVOICE TOTAL

\$9,380.00

PAYMENTS

Date Received	Pay Method	Ref. Number	Amount
<i>No payments received</i>			

TOTAL PAYMENTS

\$0.00

REMAINING BALANCE: \$9,380.00

THANK YOU FOR YOUR BUSINESS

CIBIK LAW, P.C.

1500 WALNUT STREET SUITE 900
PHILADELPHIA, PA 19102
(215) 735-1060

Invoice #10004

Posted Date: 10/27/2023

BILL TO:

Tri-State Paper, Inc.

4500 N 3rd St
Philadelphia, PA 19140-1502

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
1	10/21/2023	B160: Fee/Employment Applications: Drafted application to employ Cibik Law as Debtor's counsel, and related documents. (10/21/2023)	Michael I. Assad	1	\$350.00	\$350.00
2	10/21/2023	B310: Claims and Administration Objections: Drafted motion and proposed order to set last day to file proofs of claim. (10/21/2023)	Michael I. Assad	0.4	\$350.00	\$140.00
3	10/21/2023	A106: Communicate (with client): Sent email to client with a list of documents and information needed to prepare bankruptcy petition, schedules, and related documents. (10/21/2023)	Michael I. Assad	0.5	\$350.00	\$175.00
4	10/21/2023	A102: Research: Performed UCC search (10/21/2023)	Michael I. Assad	0.1	\$350.00	\$35.00
5	10/21/2023	A102: Research: Searched for civil judgments. (10/21/2023)	Michael I. Assad	0.6	\$350.00	\$210.00
6	10/21/2023	B110: Case Administration: Began drafting petition, statement of financial affairs, creditor matrix, and schedules. (10/21/2023)	Michael I. Assad	1	\$350.00	\$350.00
7	10/23/2023	A106: Communicate (with client): Meeting with Debtor's principal and various corporate officers to discuss financial circumstances. (w/ M. Cibik) (10/23/2023)	Michael I. Assad	2.5	\$350.00	\$875.00
8	10/23/2023	A106: Communicate (with client): Meeting with Debtor's principal and various corporate officers to discuss financial circumstances. (w/ M. Assad) (10/23/2023)	Michael A. Cibik	2.5	\$750.00	\$1,875.00

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
9	10/23/2023	A106: Communicate (with client): Phone call with debtor's principal to answer questions and discuss steps forward. (10/23/2023)	Michael A. Cibik	0.8	\$750.00	\$600.00
10	10/24/2023	A108: Communicate (other external): Left voicemail for Joe Gray, potential accountant for debtor, to request call to discuss services needed. (10/24/2023)	Michael A. Cibik	0.1	\$750.00	\$75.00
11	10/24/2023	A106: Communicate (with client): Replied to client email requesting information about where to direct creditor inquiries. (10/24/2023)	Michael I. Assad	0.1	\$350.00	\$35.00
12	10/24/2023	B110: Case Administration: Continued drafting matrix list of creditors and schedules based on information provided by creditor. (10/24/2023)	Michael I. Assad	0.1	\$350.00	\$35.00
13	10/24/2023	A108: Communicate (other external): Phone call with accountant Joe Mease to discuss accounting services needed for debtor. (10/24/2023)	Michael A. Cibik	0.9	\$750.00	\$675.00
14	10/24/2023	A108: Communicate (other external): Phone call with accountant Joe Grey to discuss accounting services needed for debtor. (10/24/2023)	Michael A. Cibik	0.7	\$750.00	\$525.00
15	10/25/2023	A104: Review/Analyze: Reviewed email sent by creditor EK (10/25/2023)	Michael I. Assad	0.1	\$350.00	\$35.00
16	10/25/2023	B150: Meetings of and Communication with Creditors: Reviewed invoice and email from creditor Imperial Dade; replied to email. (10/25/2023)	Michael I. Assad	0.1	\$350.00	\$35.00
17	10/25/2023	B110: Case Administration: Continued drafting schedules and matrix list of creditors by adding claim and address of creditors Imperial Dade and RJS. (10/25/2023)	Michael I. Assad	0.1	\$350.00	\$35.00
18	10/25/2023	A107: Communicate (other outside counsel): Phone call with Rich Hoy Esq. to discuss civil litigation pending that concerns stock of corporation. (10/25/2023)	Michael A. Cibik	0.8	\$750.00	\$600.00
19	10/25/2023	A106: Communicate (with client): Phone conversation with debtor's principal to discuss creditor issues. (10/25/2023)	Michael A. Cibik	0.5	\$750.00	\$375.00

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
20	10/25/2023	A107: Communicate (other outside counsel): Phone call with Joe Grey to discuss accounting issues (10/25/2023)	Michael A. Cibik	0.8	\$750.00	\$600.00
21	10/26/2023	A107: Communicate (other outside counsel): Phone call with Robert Reibstein about civil issues involving bankruptcy. (10/26/2023)	Michael I. Assad	0.5	\$350.00	\$175.00
22	10/26/2023	A108: Communicate (other external): Phone call with Joe Grey to obtain information needed to draft employment application. (10/26/2023)	Michael I. Assad	0.2	\$350.00	\$70.00
23	10/26/2023	B160: Fee/Employment Applications: Drafted employment application for Joe Grey as accountant. (10/26/2023)	Michael I. Assad	0.5	\$350.00	\$175.00
24	10/26/2023	A108: Communicate (other external): Phone conversation with Joe Grey to discuss duties needed as accountant for debtor. (10/26/2023)	Michael A. Cibik	0.7	\$750.00	\$525.00
25	10/26/2023	A106: Communicate (with client): Phone conversation with debtor's principal to discuss steps to be taken after case is filed. (w/ M. Cibik) (10/26/2023)	Michael I. Assad	0.5	\$350.00	\$175.00
26	10/26/2023	A106: Communicate (with client): Phone conversation with debtor's principal to discuss steps to be taken after case is filed. (w/ M. Assad) (10/26/2023)	Michael A. Cibik	0.5	\$750.00	\$375.00
27	10/26/2023	A108: Communicate (other external): Phone call with Drew Salamon to discuss possible retention as collection attorney for debtor. (10/26/2023)	Michael A. Cibik	0.5	\$750.00	\$375.00
28	10/26/2023	A108: Communicate (other external): Phone call with Rich Hoy to inform him that debtor will file tomorrow. (10/26/2023)	Michael A. Cibik	0.3	\$750.00	\$225.00
29	10/26/2023	A107: Communicate (other outside counsel): Phone call with John Raimondi to inform him that debtor will file tomorrow. (10/26/2023)	Michael A. Cibik	0.3	\$750.00	\$225.00
30	10/27/2023	E112 Court fees: chapter 11 filing fee		1	\$1,738.00	\$1,738.00

BILLABLE ITEMS

	Date	Item Details	Performed By	Qty.	Rate	Amount
31	10/27/2023	B110: Case Administration: Filed chapter 11 petition with the court using the CM/ECF system. (10/27/2023)	Nancy A. Matteis	0.5	\$200.00	\$100.00

Notes:

Services performed after payment of retainer.

INVOICE TOTAL \$11,793.00

PAYMENTS

Date Received	Pay Method	Ref. Number	Amount
<i>No payments received</i>			

TOTAL PAYMENTS \$0.00

REMAINING BALANCE: \$11,793.00

THANK YOU FOR YOUR BUSINESS